



# Welcome to the Workshop for The “New” Administrative Review for USDA Child Nutrition Programs

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# The New Administrative Review

## *More Frequent Review Cycle*

The old review name = Coordinated Review Effort, or CRE, was completed once every 5 years.

The new review name = Administrative Review, or AR, is completed once every 3 years.

# Basic Areas of an Administrative Review

The AR has two primary review areas:

- 1. *Critical Areas*** – such as items associated with the certification and benefit issuance process, the accuracy of meal counting/claiming and whether meals claimed for reimbursement meet meal pattern and nutritional quality requirements.
- 2. *General Areas of Review*** – items associated with Resource Management include but are not limited to maintenance of the nonprofit school food service account, paid lunch equity, revenue from non-program foods and USDA Foods (Commodities). Other items include but are not limited to, civil rights, food safety and the self-monitoring process.



## School Selection for the Administrative Review

While an SFA is selected for an Administrative Review based on the 3 year cycle, schools within the SFA are selected based on a USDA formula.

# Basic Administrative Review Parts

There are two basic parts to the new AR

1. Offsite - information that is collected prior to a review visit.
2. Onsite - visual inspection of certain items completed through a reviewer's visit to the SFA/school. This will include both an entrance conference and an exit conference.

# The Administrative Review is All Inclusive

The Administrative Review includes a review of all Child Nutrition Programs that operate within an SFA. For example a school may have any one, or all, of the following:

- School Breakfast Program
- National School Lunch Program
- Fresh Fruit and Vegetable Program
- Special Milk Program
- After School Snack Program
- Seamless Summer Program

# NSLP Administrative Review Guidance

*The State Agency Reviewer has a set series of questions. The questions are divided into subject areas that include:*

- Nutritional Quality and Meal Pattern
- Meal Access and Reimbursement
- Resource Management
- General Program Compliance

# Nutritional Quality and Meal Pattern

Includes, but is not limited to:

- Menus
- Materials that support the menus, such as
  - Child Nutrition Labels
  - Standardized Recipes
  - Nutrition Fact Labels
  - Menu Worksheets
  - Production Records



# Meal Access and Reimbursement

Includes but is not limited to:

- Certification and Benefit Issuance
- Verification
- Meal Counting and Claiming

# Resource Management

Aspects of the Resource Management section of the review are determined through the completion of a Risk Assessment. The Risk Assessment may be low or high based on the Resource Management Risk Indicator Tool Questionnaire. Questions and activities within this area depend upon the risk indicator identified.

# Resource Management Areas

Enrollment Size

Financial Audits

Previous Review Findings

Cash Resources

Fund Balances

Paid Lunch Equity

Meal Charging Policy

Revenue from Non-  
Program Foods

Indirect Costs

Indirect Cost Rates

USDA Foods

Food Service Management  
Companies

# General Program Compliance

There are general questions on the following (Note: this is not an all inclusive list)

- Civil Rights
- Self-monitoring Process
- Local School Wellness Policy
- Competitive Foods
- Water Availability
- Food Safety (Hazard Analysis at Critical Control Points)
- Reporting and Recordkeeping
- Other Child Nutrition Programs

# Tips for Getting Ready for a Review

## General

Is paperwork in order and deadlines met for:

- On-Site Monitoring
- HACCP plan for food safety
- Local School Wellness Policy
- Competitive Foods
- Water Availability
- Reporting and Recordkeeping
- Other Child Nutrition Programs

# Free and Reduced Price Applications

Check to be sure the following items on the free and reduced price applications are accurate: (Note: this is not an all inclusive list)

- The adult signature is available
- Last 4 digits of the SS# is listed (if required) or the box, “I do not have a SS number,” is checked
- Income correctly calculated and determined
- There is a ReachUp/3Squares number listed, if applicable
- Household size correctly determined

# General Areas

- Accuclaim/On-Site Review/SFA On-Site Monitoring  
Completed by February 1<sup>st</sup> of every year  
Paperwork properly completed and all corrective action steps completed satisfactorily
- HACCP plan for food safety  
Plan is complete with forms and SOPS
- Local School Wellness Policy  
Wellness policy is revised to include new HHFKA wellness criteria
- Competitive Foods  
Are all foods that compete with the child nutrition programs following the USDA nutrient standards?

# General Areas

- Water

Do students have free and easy access to potable water, either in the cafeteria or in close vicinity to the cafeteria?

- Reporting and Recordkeeping

Are all other reports and records in order?

- Other Child Nutrition Programs

Is everything in line with all other meal programs operating in the school?



# What if a Review Finding occurs?

Sometimes, even the best review pre-planning is not enough and technical assistance is needed or a finding occurs during an Administrative Review.  
What can you expect?

# Technical Assistance, Corrective Action and Financial Finding

*At any time during the offsite or onsite portion of the Administrative Review one of the following may occur:*

- **Technical Assistance (TA)** Guidance given during an AR, or any other time. A great deal of technical assistance is given during the AR. TA does not trigger a need to submit a plan to Child Nutrition Programs
- **Corrective Action (CA)** A review item that is found to be in non-compliance to the USDA regulations. The SFA must submit a CA Plan to rectify the situation and come into compliance.
- **Fiscal Action (FA)** Some corrective action errors trigger a financial finding. Errors generating FA generally occur in the meal counting and claiming, the meal pattern or the benefit issuance (free and reduced price application errors) areas.

# What may trigger corrective action?

An example may be:

- The Free and Reduced Price School Meals Family Application was reviewed and approved but was not complete. **Examples are:**
  - The adult signature is missing
  - Last 4 digits of the SS# (if required) is missing or the household did not check the box, “I do not have a SS number”
  - Income incorrectly determined
  - No 3Squares or ReachUp number listed, if applicable
  - Household size was incorrectly determined

# Example of Corrective Action Trigger in Meal Counting and Claiming

## **Example:**

Meal counting of meals claimed for monthly reimbursement was not accurate

- The Point of Service count was taken before a reimbursable/complete meal was served to a student, therefore, the meal counting and claiming system was not accurate.

# Note On Corrective Action Issues

Some errors that trigger a corrective action may be able to be taken care of on the day of the review or close to the day of the review. If this happens, the issue is no longer a corrective action and is noted as such.

So.....A finding occurred and a  
corrective action was needed.

What next?



# Findings resulting in a plan of Corrective Action

## Definition of a Corrective Action Plan

- A Corrective Action Plan is a change implemented by the child nutrition program to address non-compliance with a federal or state regulation, as identified through an Administrative Review

## Example: Corrective Action for a Meal Counting Error

Develop, implement and submit a plan to your administration and then to the State Agency to establish a double-check system to ensure that students receiving meals per day are only claimed for one (1) meal per meal service. This plan may include information on:

1. How meals that **should not** be counted for reimbursement will be identified.
2. How meal count records will be reviewed to identify those students receiving lunch and breakfast (if applicable) meals per day.
3. Identify the title/position of the person performing the double-check of meal counts.
4. Ensure that a student is claimed for only one lunch and one breakfast (if applicable) per day.



# Example Response to a Meal Count Finding requiring a plan of Corrective Action

## **NSLP- Meal Count**

**Position Responsible:** Cook/Director/Teacher

**Objective:** To submit an accurate monthly NSLP meal/snack count to SFA for reimbursement.

The Point-Of-Service meal count must be taken when with student has a complete reimbursable meal in front of them.

1. At the time of meal service, the Food Service Staff will use the appropriate procedure to identify each student who has a complete reimbursable meal/snack in hand.
2. Any non-reimbursable meals are not included in the claim
3. At the end of the day, the meal count record and menu will be turned in to the authorized person for tally. The menu will be evaluated to determine that a creditable meal was served. The total number of reimbursable meals will be recorded at the bottom of the meal count record for the day.
4. At the end of the week, the authorized person will double-check meal counts to ensure accuracy.

# What if Fiscal Action is Required?

- \$600 disregard if not systemic issue, required by USDA or repeat finding (State Agency has discretion to take any amount)
- Duration of fiscal action may be day, week, month or year, based on severity or longevity of the problem
- Fiscal action calculated based on formula
- Fiscal action can be appealed
- Future claim will be adjusted by reducing meals served to equal amount of money in fiscal action (except at fiscal year end)

# Completion of the review

The Administrative Review is finished when:

- The corrective action plan has been submitted to, and approved by, the State Agency
- The fiscal action adjustment is complete
- The closure letter is written and sent to the SFA

# What have we seen so far?

## Production Records:

- Including all necessary information
- Matching to Menus
- Listing all offered items
- Including crediting information

# What have we seen so far?

## Meal Components, Counting and Claiming:

- Using correct Exhibit A when crediting Grains
- Identifying correct Vegetable Sub-groups
- Recognizing a reimbursable meal
- How to credit a salad bar after the POS
- Not claiming non-reimbursable meals

# What have we seen so far?

## Applications:

- Processing applications correctly
- Updating POS and Master Rosters as benefits change and students come and go
- Updating POS and Master Rosters as the direct certification list is downloaded

# What have we seen so far?

## Miscellaneous:

- OVS signage
- Wellness Policy Assessment and Implementation (refer to handout for 2004 to 2010 comparison)
- HACCP Plans with SOPs appropriate to menu and recipes

# What can make it easier for YOU?

- Standardize your recipes
- Serve Cycle Menus
- Organize labels and Product Formulation Statements
- Confirm product received is the product you ordered
- Keep the lines of communication open



# What's Next?

For SY 2014-2015

- 100% Whole Grain Rich for Breakfast & Lunch
- Sodium Level Requirements start for Breakfast & Lunch
- Students must take a fruit or a vegetable for a reimbursable breakfast
- The first two cups of vegetables offered for breakfast for the week must be from the Dark Green, Red/Orange, Beans/Legumes or Other sub-groups
- Know the changes in A La Carte rules

# Questions?

For further information, please feel free to contact:

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